

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE ROYAL BANK OF SCOTLAND  
GROUP PLC SECURITIES LITIGATION

09 Civ. 300 (DAB)

LIGHTHOUSE FINANCIAL GROUP,  
Individually and On Behalf of All Others  
Similarly Situated,

11 Civ. 398 (GBD)

Plaintiff,

v.

THE ROYAL BANK OF SCOTLAND  
GROUP PLC, *et al.*,

Defendants.

ETHAN GOLD, Individually and On Behalf  
of All Others Similarly Situated,

11 Civ. 1162 (NRB)

Plaintiff,

v.

THE ROYAL BANK OF SCOTLAND  
GROUP PLC, *et al.*,

Defendants.

**NOTICE OF LIGHTHOUSE FINANCIAL GROUP LLC'S  
CROSS-MOTION TO APPOINT LEAD PLAINTIFF AND LEAD COUNSEL**

**SADIS & GOLDBERG LLP**

Charles H. Dufresne, Jr.

551 Fifth Avenue, 21st Floor

New York, New York 10176

Tel: 212-573-6660

*Counsel for Plaintiff Lighthouse Financial  
Group LLC*

**GARDY & NOTIS, LLP**

Mark C. Gardy

James S. Notis

Kira German

560 Sylvan Avenue

Englewood Cliffs, New Jersey 07632

Tel: 201-567-7337

PLEASE TAKE NOTICE that plaintiff Lighthouse Financial Group LLC (“Lighthouse”), by its counsel, will hereby move this Court on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, New York 10007-1312, for an Order (i) appointing Lighthouse as lead plaintiff on behalf of purchasers of American Depositary Receipts for ordinary shares of the Royal Bank of Scotland Group plc listed and traded on the New York Stock Exchange between March 1, 2007 and January 19, 2009, inclusive (the “ADR Class”); (ii) approving Lighthouse’s selection of Gardy & Notis, LLP and Sadis & Goldberg LLP as co-lead counsel for the ADR Class; and (iii) granting Lighthouse such other and further relief as the Court deems appropriate. In support of this Cross-Motion, Lighthouse submits herewith a supporting Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that counsel for plaintiff Lighthouse hereby requests oral argument.

Dated: May 6, 2011

Respectfully submitted,

**SADIS & GOLDBERG LLP**

By: s/ Charles H. Dufresne, Jr.  
Charles H. Dufresne, Jr. (CD-4864)  
551 Fifth Avenue, 21st Floor  
New York, New York 10176  
Tel: 212-573-6660  
Fax: 212-573-6661

**GARDY & NOTIS, LLP**

By: s/ James S. Notis

James S. Notis (JN-4189)

Mark C. Gardy

Kira German

560 Sylvan Avenue, Suite 3085

Englewood Cliffs, New Jersey 07632

Tel: 201-567-7337

Fax: 201-567-7377

*Counsel for Lighthouse Financial Group LLC*